

Comments on the October 26, 1990, Environmental Restoration
Health and Safety Program Plan and Workbook for Rocky Flats Plant

General Comments. The revised Health and Safety Program Plan (HSPP) and Health and Safety Plan Workbook (HSPW) remain very general in nature with frequent reference to previously prepared manuals, and deference to site specific Health and Safety Plans (HSP). Any procedures, protocols or hazard assessments that are general to the entire Environmental Restoration (ER) program could have been included within the HSPP. This may be directly applicable to monitoring protocol and specifically real time monitoring, and the resuspension of radionuclide contaminated dust. Inclusion of hazard assessments and procedures or protocol generic to generally anticipated ER tasks would minimize the possibility of initiating inconsistent practices or inadvertently omitting important health and safety practices. This problem may become especially evident for subcontractors who may not be familiar with all of the internal EG&G manuals and procedures. DOE should be aware of this possibility and evaluate the effectiveness of this structure. The HSPP and HSPW should be considered living documents subject to revision, as experience may identify health and safety practices, procedures or protocols in need of improvement.

The HSPW was not fully revised to reflect DOE response to EPA and State comments on the draft document. This must be completed quickly to allow site specific HSPs to be drafted and so as to apply to response activities already ongoing.

Specific Comments.

HSPP, Section 1.5, page 1-5. The IAG reference to March, 1990, is confusing.

HSPP, Section 1.6, page 1-6. The text states that TCE and PCE have been detected in the groundwater, but relegates all other referenced organics as contaminants of concern. These other contaminants of concern have also been detected in the groundwater.

HSPP, Figure 1-3. If possible, the location and reference number of individual hazardous substance sites should be indicated.

HSPP, Section 2.2.5., page 2-4. The HSPP should specifically state whether the Site Health and Safety Coordinator (SHSC) is responsible for determining whether PPE levels are adequate and for issuing stop work orders.

HSPP, Figure 2-1. The EG&G General Manager is no longer Mr. B. P. Warner.

HSPW, Section 3.2, page 3-3. The HSPW should be updated to reflect any additional Standard Operating Procedures (SOP) if applicable to the HSPW of HSPW.

HSPW, Section 5.2.8., page 5-8. This section should explicitly state where dosimetry records will be maintained.

HSPW, Section 7. This section was transmitted without pages 7-3, 7-5 and 7-7.

HSPW, Section 2.4, page 7. The DOE response to EPA comments states that EG&G personnel, subcontractors and visitors on Plant Site are issued radiation dosimeters to monitor compliance with RFP dose guidelines. Presently, this stated practice is not occurring for EPA personnel and EPA contractors.

HSPW, Appendix A, page 6. The hazard assessment overview does not require definition of the media in which the hazards are associated.

HSPW, Appendix B. This section could be revised to present general chemical and toxicity data for radionuclides.